

1 Department's redevelopment of its risk management program, including significant
2 policy evolution, remains in progress.

3 **I. Internal Restructuring to Support a Robust Risk Management Program**

4 Deputy Chief Angelica Mendoza leads the newly minted Bureau of Risk
5 Management (BRM).¹ The BRM houses the Internal Affairs Division (IAD), Office
6 of Inspector General (OIG), the Training Division, Research and Planning, the
7 Personnel Assessment System (PAS) Administration Unit, and the recently created
8 Risk Impact and Risk Analysis Units. The Risk Impact Unit is responsible for
9 centralizing, managing, and coordinating stop data as well as data on force,
10 pursuits, and collisions. The Risk Analysis Unit, led by the Department's data
11 manager, assesses risk data, conducts data analyses, provides its work product to
12 supervisors and commanders, and supports risk management meetings.

13 The BRM unites Department policy, training, intervention, and
14 accountability functions to facilitate Department-wide communication and use of
15 PAS and Vision performance information and data trends. The BRM forms an
16 important foundation for the Department's reconstruction of its risk management
17 program.

18 **II. Advancements in Data and Risk Management Transparency**

19 The BRM has also helped the Department make important advancements in
20 data and risk management transparency. Increasing public transparency is part of
21 the Department's risk management program development. The Department
22 recognizes that providing prompt public access to its stop data and sharing with the
23 community how the Department uses data to achieve fair and impartial policing are
24 essential steps to strengthen public accountability and earn public trust.

25 Accordingly, the Risk Impact and Analysis Units now publicly release the
26 Department's stop data on a quarterly basis. On April 27, 2021, the Department

27 ¹ From in or about 2011 until May 2014, the Department had a Bureau of Risk
28 Management. The earlier version, however, was comprised only of IAD, OIG, and
the Training Division.

1 posted January through March 2021 stop data. The data is available as raw data in
 2 an Excel spreadsheet format and in a report synthesizing the data. *See 2021 OPD*
 3 *First Quarter Stop Data Report* and *2021 OPD First Quarter Stop Data Report –*
 4 *Source Data*, <https://www.oaklandca.gov/resources/stop-data> (last visited May 18,
 5 2021).

6 In addition, on May 19, 2021, Mayor Schaaf and Chief Armstrong hosted a
 7 public Town Hall meeting entitled, “*OPD By The Numbers: How OPD Uses Data To*
 8 *Improve Policing*.” During the meeting, the Department demonstrated to the public
 9 how it uses different types of data including stop data, use of force data, internal
 10 affairs data, and personnel information to identify trends and outliers that may
 11 suggest potential problems, reveal possible solutions, assist the Department in
 12 assessment and critical analysis of racial disparities, and ultimately improve
 13 policing. Explaining the process to community members also supports the
 14 Department’s efforts to prepare to communicate, both orally and in written
 15 guidance, the risk management process and expectations across all supervisory
 16 levels Department-wide.

17 **III. Risk Management Meeting Redevelopment**

18 The Department has created a working group to develop a process to support
 19 risk management meetings. The Department’s aim is to ensure the process is
 20 comprehensive and consistent without being cumbersome inflexible.

21 To that end, the working group has drafted a high-level periodic analysis
 22 concept report to capture and compare current risk data with data from prior time
 23 periods of similar duration (e.g., months or years) and assess data trends, changes,
 24 and outliers in each Area and Citywide. As an example, a draft Citywide Monthly
 25 Analysis Report is attached as Exhibit 1. The draft template report shows the
 26 categories of data the Department anticipates it may include. While the
 27 Department is eager to share its progress, it must emphasize that these concept
 28 reports remain under review and will likely undergo further revision.

1 The Department plans to hold monthly risk management meetings to review
2 Area, Bureau, or Citywide data based on a schedule that permits quarterly
3 command review at each level. The periodic analysis report will serve as the
4 foundation for a CompStat-style risk management meeting. CompStat, short for
5 computer statistics or comparison statistics, is a data-driven police management
6 technique developed in New York to help police choose strategies to reduce and
7 prevent crime based on accurate data collection. Police departments including the
8 Los Angeles Police Department have evolved the CompStat model to look within the
9 organization to manage police personnel and risk management issues.

10 The Oakland Police Department aspires to use a similar CompStat-style,
11 data-driven method to help the Department choose strategies to mitigate risk and
12 identify problem officers and behaviors. Using this new framework for risk
13 management meetings, outlier data will continue to require further analysis but
14 presenting supervisors will also identify and address data changes or trends that
15 suggest or demonstrate increased risk or detrimental impact. Data changes or
16 trends may suggest, for example, a need for training or policy revision, and may
17 also later reflect the impact of such a targeted training or policy revision.

18 Once the Department confirms additional details of its particular CompStat-
19 style approach, the Department must ensure that the selected data captured in the
20 periodic analysis reports is easy to extract and analyze, including viewable trend
21 lines. The Department then intends to conduct a mock risk management meeting to
22 familiarize commanders with the new style and process. The mock meeting will
23 encourage questions and foster discussion to make sure that supervisors are
24 comfortable with the new risk management program and meeting process.

25 The Department appreciates that supervisors must have a certain level of
26 comfort with the new process, including accessing, understanding, and using the
27 data to find data-driven strategies to improve fair and impartial policing.

28 Supervisors should understand not only how to identify and address outlier officers

1 and behaviors but how to look for similarities among officers or behaviors that may
2 suggest a more generalized root cause. Identifying a root-based solution to address
3 multiple officers and constellations of behaviors may be more efficacious than
4 working to curb a behavior by a specific officer and may also better prevent issues
5 from becoming more widespread.

6 **IV. Policy Development**

7 Departmental institutionalization of the risk management program will
8 culminate in revised policy. The Department is working on (1) an overarching
9 general risk management policy, (2) a revision of Departmental General Order
10 (DGO) D-17, *Personnel Assessment System* (last revised in 2013), (3) written
11 guidance for supervisors, commanders, and executives on risk management
12 expectations, including expectations related to the risk management meeting
13 process, and (4) written guidance on use of data dashboards.

14 The Department will revise and preserve the content of DGO D-17 in a new
15 policy governing the use, administration, and timely update of the Department's
16 PAS early warning system. The Department's use of the PAS early warning system
17 as part of its overall risk management strategy will be set forth in the overarching
18 risk management policy.

19 The risk management policy will also include risk management meeting
20 protocols. The Department expects to develop written guidance for each level of
21 supervision predicated on the meeting protocols set forth by policy.

22 **V. Conclusion**

23 The Department is currently focused on establishing an overarching set of
24 risk management program protocols, determining that selected data for the periodic
25 analysis reports is reported or accessible in a manner that supports these protocols,
26 and building out a risk management meeting design based on these protocols. Once
27 the Department has confidence that it has designed risk management processes
28 that work in practice, the Department will complete draft policy to capture these

1 processes and associated guidance. The Department looks forward to sharing its
2 further progress with the Court.

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4 Respectfully submitted,

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